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October 30, 1992

ORIGINAL  
FILE

RECEIVED

OCT '30 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Donna Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, DC 20554

Re: **Ex Parte Presentation**  
GEN Docket No. 90-314; ET Docket No. 92-100  
CC Docket No. 92-115 ✓

Dear Ms. Searcy:

This letter serves as notification that on October 29, 1992, Mark Stachiw, Counsel for PacTel Paging, met with Stevenson S. Kaminer of Commissioner Marshall's office, Lauren Belvin of Commissioner Quello's office, Charla Rath of Chairman Sikes' office, Byron Marchant of Commissioner Barrett's office, and Renee Licht of the Office of General Counsel to discuss issues relating to the above-referenced proceedings. Mr. Stachiw was accompanied by Carl W. Northrop (Communications Counsel - Bryan Cave) and Gerald Udwin (Principal - The Udwin Group).

The purpose of the meetings was to discuss issues related to allocation of spectrum for narrowband PCS service under GEN Docket No. 90-314 and ET Docket No. 92-100, and concerns related to rule changes under Part 22 of the Commission's rules as set forth in the Notice of Proposed Rulemaking, in CC Docket No. 92-115.

Pursuant to Section 1.1206 of the Commission's rules, copies of materials distributed at these meetings are attached hereto.

**BRYAN CAVE**

Ms. Donna Searcy  
October 30, 1992  
Page 2

Should any questions arise in connection with this matter, please contact the undersigned.

Sincerely,



Carl W. Northrop

**Enclosures**

cc: Stevenson S. Kaminer, Senior Advisor to  
Commissioner Marshall  
Lauren Belvin, Legal Advisor to Commissioner Quello  
Charla Rath, Special Assistant to Chairman Sikes  
Byron Marchant, Legal Advisor to Commissioner Barrett  
Renee Licht, Acting General Counsel

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OCT '30 1992

**Lessons to Be Learned From the Paging Business** FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In allocating spectrum in the 900 MHz bands for PCS services, the Commission should draw upon the experience gained in other land mobile services. In discussions with Commission personnel, PacTel Paging ("PacTel") has concluded that considerable attention has been paid to the experience gained from various two-way businesses (e.g. cellular, SMR). Less attention has been paid to the lessons that can be learned from the long history of the one-way industry.

Because of some inherent similarities between the family of services that can be provided in the narrowband PCS portion of the spectrum and which have been provided by traditional paging companies, the experience gained in the paging business is certainly relevant. The following summary, prepared based upon the substantial participation of PacTel as a major provider of such services, highlights the lessons the Commission can learn from the paging business:

- I. **Market Demands Have Created a Handful of Large Geographic Area Regions.**
  - A. The PCS Notice seeks comment on four alternative geographic plans (nationwide, 49 Major Trading Areas, 194 LATAs or 488 Basic Trading Areas.) None of these demarcations bears any meaningful relationship to the natural service territories that have developed in the marketplace for messaging services.
  - B. All of the largest and most successful providers of paging services (e.g. PacTel Paging, PageNet, Metromedia Paging, MobilComm, McCaw Paging, Ameritech) have subdivided their operations into a handful of service regions to tailor their operations to market demands.
  - C. While there is a demand for nationwide paging service, the extent of the demand is modest compared to those seeking wide-area regional coverage.
  - D. In the absence of a licensing scheme that enables a carrier to be licensed as an initial matter for a sufficient geographic area, carriers are subjected to unnecessary expenses and delays in implementing wide-area

systems to meet customer demands, if indeed such systems can ever be effected through aggregation of smaller areas.

**Conclusion:** The Commission should adopt a regional licensing plan for narrowband PCS that provides for from 3 to 5 large geographic regions. Due to differences in system architecture, the same regions need not be adopted for wideband PCS.

## **II. Financial Wherewithal is a Key Ingredient to Success.**

- A. Financial showings were eliminated as an application requirement in the paging services in 1980, based upon a finding that service could be implemented on a low cost low risk basis. The business has changed significantly since that time.
- B. Revenues per unit in the paging business have declined as operating expenses as a percentage of revenue have increased. As margins have decreased, volume must increase to sustain operations. The result: the emergence of mega-carriers which serve a large percentage of the paging market.
- C. Economies of scale play an increasing role in the provision of paging services. Volume discounts in the purchase of carrier and subscriber equipment and operating efficiencies in the centralization of functions contribute to this fact.
- D. Access to capital is increasingly important. Like other communications ventures, paging transactions are frequently highly leveraged and do not meet increasingly stringent banking ratios.
- E. The proliferation of wide area systems has substantially increased the minimum investment necessary to establish a competitive service offering.
- F. The successful providers of paging service are all well-financed and have the wherewithal to attract capital

**Conclusion:** Applicants for Narrowband PCS licenses should be required to demonstrate the financial ability to construct the system encompassed by the narrowband license that is awarded.

**III. The Initiation of Reliable Service on a Broad Geographic Scale is Essential to Competitive Success.**

- A. Advanced messaging services will be competing with traditional messaging services for subscribers. In order to compete effectively, service areas must be competitive.
- B. In the paging business, new entrants to a market generally succeed only when they initiate service on a system that is comparable or superior to existing carriers in the market, both in terms of quality and range of coverage.
- C. Careful engineering is necessary to design a system that provides reliable real world coverage throughout a target service area.

**Conclusion:** Applicants for narrowband PCS should be required to submit detailed engineering showing the transmitter sites and operating parameters that will be used to cover 70% of the populated area of the requested region.

**IV. 25 kHz of Spectrum Provides an Appropriate Building Block for Narrowband Services.**

- A. The paging industry has succeeded in delivering a broad array of innovative services within the confines of 25 kHz base transmit channels.
- B. Much of the developmental work being performed for narrowband PCS services by manufacturers and service providers is focusing upon 25 kHz channels for base station transmissions.
- C. PacTel has studied the prospects for increased transmission speeds and data delivery rates within 25 kHz of spectrum, and

has achieved significant advancements in the state of the art.

- D. The vast majority of those seeking pioneer preferences for narrowband services propose 25 kHz base transmit channels. Those seeking more generally require increments of 25 kHz (e.g. MTEL at 50 kHz) that could be accommodated through a filing scheme that allows applicants to aggregate multiple 25 kHz blocks, or a channel plan that aggregates spectrum in increments of 25 kHz.

**Conclusion:** The narrowband PCS channel plan should encourage the implementation of advanced paging technology through the allocation of some 25 kHz channels.

**V. Subscribers are Demanding Low Cost Alternatives.**

- A. Although the advent of cellular service was considered by some to be a threat to paging services, the dire predictions proved completely untrue. Paging providers have enjoyed explosive growth in parallel with the growth of cellular.
- B. Economies of scale have enabled the cost of one-way subscriber units to fall below \$100, opening up a vast consumer market.
- C. The market for low cost personal communications devices is two-tiered: some use them as alternatives to higher cost services; others use them as adjunct services.

**Conclusion:** Licensees should be encouraged to adopt technical standards which allow for economies of scale in the production of subscriber equipment and facilitate roaming, both of which will foster lower costs units and services. The Commission also must undertake allocation actions which will minimize the price of subscriber equipment and service costs.

**VI. Licensing Policies Must Allow For Future Channel Grants to Accommodate the Incremental Growth of Systems.**

- A. Unlike the cellular business where the licensee receives an initial grant of all the spectrum likely to be licensed over the life

of the system, paging systems have grown by the addition of channels over time as needed to meet increased demand.

- B. Licensing policies which enable carriers to add spectrum at future dates to meet increased demand serve to reward efficient and successful operators who are providing a needed public service.

Conclusion: Narrowband PCS rules should enable providers to expand their service offerings by adding channels to existing systems over time.

**MEETING WITH FCC COMMISSIONERS' STAFF,  
OFFICE OF ENGINEERING AND TECHNOLOGY, AND  
OFFICE OF PLANS AND POLICY**

**OCTOBER 28-29, 1992**

**PACTEL PAGING  
Three Forest Plaza, SUITE 800  
Dallas, Texas 75251**



## **NARROWBAND PCS SERVICE BAND PLAN CONSIDERATIONS**

- **IN PACTEL'S VIEW, ANY BAND PLAN ADOPTED BY THE COMMISSION MUST**
  - **ALLOW A VARIETY OF NARROWBAND SERVICES REQUIRING DIFFERING BANDWIDTHS (25, 50, AND 100 KHZ) WITH 901-902 RESERVED FOR LOW POWER OPERATIONS**
    - **THESE BANDWIDTHS ARE SUFFICIENT TO SATISFY THE NEW SERVICES WHICH WILL BE OFFERED IN THIS BAND**
    - **THE CHANNEL WIDTH IN THE SUBSCRIBER-TO-NETWORK DIRECTION MUST BE SUFFICIENTLY LARGE TO PERMIT INEXPENSIVE SUBSCRIBER EQUIPMENT**
    - **MOST OF THE CURRENT PROPOSALS FOR THIS BAND CAN BE ACCOMMODATED USING THESE BANDWIDTHS IF SOME AGGREGATION IS PERMITTED**
  - **ALLOCATE SPECTRUM FOR BOTH FULL TWO-WAY SERVICES AND LIMITED TWO-WAY SERVICES**
  - **PROVIDE A SUFFICIENT NUMBER OF CHANNELS OF EACH BANDWIDTH TO PERMIT ROBUST COMPETITION AND THE GREATEST OPPORTUNITY FOR SERIOUS APPLICANTS TO RECEIVE AUTHORIZATIONS**
  - **PERMIT ESTABLISHED OPERATORS AND NEW ENTRANTS, AND LARGE COMPANIES AND ENTREPRENEURS, TO PARTICIPATE**
    - **THERE MUST BE NO LIMITATION ON WHO MAY APPLY FOR SPECTRUM**
    - **THE GEOGRAPHIC SCOPE OF THE AUTHORIZATION MUST NOT BE SO LARGE AS TO EXCLUDE ANY GROUP FROM APPLYING WHILE PROVIDING REGIONAL (MULTISTATE) AREAS FOR LICENSES**
- **PACTEL HAS DESIGNED A BAND ALLOCATION SCHEME WHICH ALLOCATES THE 3 MHZ OF 900 MHZ NARROWBAND PCS SPECTRUM (SEE ATTACHMENT 1)**

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## **NARROWBAND PCS LESSONS TO BE LEARNED FROM THE PAGING BUSINESS**

- **THE COMMISSION SHOULD ADOPT A REGIONAL LICENSING PLAN FOR NARROWBAND PCS THAT PROVIDES FOR FROM 3 TO 5 LARGE GEOGRAPHIC REGIONS (SEE ATTACHMENT 2)**
- **APPLICANTS FOR NARROWBAND PCS LICENSES SHOULD BE REQUIRED TO DEMONSTRATE FINANCIAL ABILITY TO CONSTRUCT THE NARROWBAND LICENSE AWARDED**
- **APPLICANTS FOR NARROWBAND PCS SHOULD BE REQUIRED TO SUBMIT ENGINEERING SHOWING THE TRANSMITTER SITES, ETC. TO COVER 70% OF THE POPULATED AREA OF THE REGION WITH AN APPROPRIATE APPLICATION FEE**
- **THE CHANNEL PLAN SHOULD ALLOW MIGRATION OF EXISTING PAGING TECHNOLOGY TO NARROWBAND PCS SPECTRUM THROUGH THE ALLOCATION OF SOME 25 KHZ CHANNELS**
- **LICENSEES SHOULD BE ENCOURAGED TO ADOPT TECHNICAL STANDARDS WHICH WOULD ALLOW FOR ECONOMIES OF SCALE FOR SUBSCRIBER EQUIPMENT AND ROAMING**
- **NARROWBAND PCS SERVICE PROVIDERS WILL NEED TO BE ABLE TO EXPAND THEIR SERVICE OFFERINGS BY ADDING ADDITIONAL CHANNELS AND NOT REFARMING EXISTING CHANNELS**
- **THE COMMISSION MUST UNDERTAKE ALLOCATION ACTIONS WHICH WILL MINIMIZE THE PRICE OF THE SUBSCRIBER EQUIPMENT AND SERVICE COSTS**

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## NARROWBAND PCS ON GOING EXPERIMENTAL WORK

- **PACTEL MENTIONED IN AUGUST THAT IT HAD BEGUN THE SECOND PHASE OF ITS NARROWBAND PCS EXPERIMENTATION TO DEVELOP A SYSTEM TO DELIVER 19.2 K BAUD IN A 25 KHZ CHANNEL (38.4 K BAUD IN A 50 KHZ CHANNEL) TO SUBSCRIBERS IN AN UNFORMATTED FORM**
- **THE CAPACITY OF THE SYSTEM WILL BE INCREASED EXPANDED EVEN FURTHER WITH THE USE OF AN ACKNOWLEDGEMENT/SETUP CHANNEL WHICH WOULD ALLOW THE MESSAGE TO BE TRANSMITTED ONLY IN THE METROPOLITAN AREA WHERE THE SUBSCRIBER IS LOCATED**
  - **ASSUMING ACKNOWLEDGEMENT/SETUP CHANNELS USED IN TOP 30 MARKETS, THEN CAPACITY OF SINGLE SYSTEM COULD BE INCREASED TO 5.4 MILLION SUBSCRIBERS PER CHANNEL WITH AVERAGE MESSAGE LENGTHS OF 5,000 BITS**
- **THIS IS COMPARED TO TODAY'S SYSTEMS WHICH COULD SUPPORT LESS THAN 2,000 SUCH SUBSCRIBERS IN THE SAME BANDWIDTH – A POTENTIAL 6,000% INCREASE IN CAPACITY**
- **THIS SYSTEM USES THE FUNDAMENTAL RESEARCH CONDUCTED BY PACTEL FROM JULY 1991 THROUGH AUGUST 1992 TO INCREASE THE SIMULCAST LIMIT FROM 3200 BAUD TO 4800 BAUD**
- **PACTEL HAS BUILT THE PROTOTYPE SYSTEM AND IS IN THE PROCESS OF CONDUCTING EXPERIMENTS ON IT IN THE LABORATORY**
  - **PACTEL EXPECTS THAT THE SYSTEM INFRASTRUCTURE COST WILL BE VERY FAVORABLE TO WHEN COMPARED WITH CURRENT ONE-WAY MESSAGING SYSTEMS**
  - **PACTEL ALSO PREDICTS THAT THE SUBSCRIBER EQUIPMENT WILL COMPARE VERY FAVORABLY TO CURRENT SUBSCRIBER EQUIPMENT COST (LESS THAN \$100 PER UNIT)**
- **PACTEL WILL AT THE SAME TIME CONTINUE WORKING WITH MANUFACTURERS AND INDUSTRY COMMITTEES TO DEVELOP THE NECESSARY CODING SCHEMES AND INFRASTRUCTURE TO OFFER THE SERVICE**

## **NARROWBAND PCS ON GOING EXPERIMENTAL WORK (CONT'D)**

- **THIS SYSTEM ALSO SATISFIES PACTEL'S OTHER CRITERIA**
  - **THE SYSTEM WILL BE ABLE TO GRACEFULLY GROW FROM LOW SPEEDS (2400 BAUD) TO MAXIMUM SPEEDS (19.2-26 K BAUD)**
  - **THE SYSTEM WILL SUPPORT MORE THAN ONE PAGING FORMAT AND SPEED**
- **PACTEL IS VERY EXCITED THAT THE FIRST OF THE TRULY NEW NARROWBAND PCS SERVICES IS ALMOST AVAILABLE**

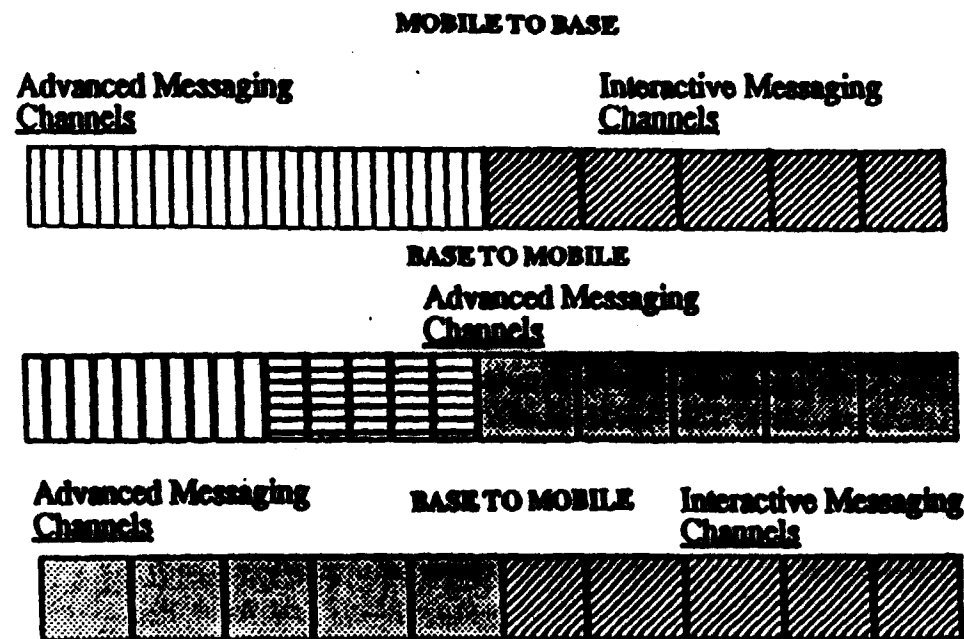
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## PART 22 REWRITE

- **PACTEL APPLAUDS THAT COMMISSION'S EFFORTS TO FURTHER STREAMLINE THE REGULATORY PROCESS FOR COMMON CARRIERS**
- **THERE IS GENERAL AGREEMENT, HOWEVER, BY THE WIRELESS COMMON CARRIER INDUSTRY OPPOSING SEVERAL OF THE POSITIONS TAKEN IN THE NPRM**
  - **THE INDUSTRY VEHEMENTLY OPPOSES THE PROPOSED FIRST-COME, FIRST SERVED RULES, BUT DOES SUPPORT SHORTENED FILING PERIODS AND LIMITATIONS ON WHO MAY FILE AGAINST FILED APPLICATIONS**
  - **THE INDUSTRY OPPOSES UNLIMITED CONDITIONAL LICENSES, BUT WOULD SUPPORT CONDITIONAL LICENSES OF LESS THAN ONE YEAR**
  - **THE INDUSTRY OPPOSES A MULTIFREQUENCY TRANSMITTER PROHIBITION, BUT DOES SUPPORT SOME LIMITATION ON HOW MANY FREQUENCIES AND FOR HOW LONG FACILITIES MAY BE MULTIFREQUENCY**
- **PACTEL URGES THE COMMISSION TO NOT ADOPT ITS ORIGINAL NPRM POSITIONS ON THESE MATTERS, BUT RATHER ADOPT THE INDUSTRY MODIFIED POSITIONS**

# **Proposed Channel Scheme Narrow Band PCS Spectrum**

ATTACHMENT 1



## **901-902 MHz.**

25, 20 KHz. Advanced Messaging Channels paired with base-to-mobile Advanced Messaging Channels. (Unused channels to be available to current one-way licensees.)

5, 100 KHz Interactive Messaging Channels paired with base-to-mobile Interactive Messaging Channels.

## **930-931 MHz.**

5, 100 KHz Advanced Messaging Channels

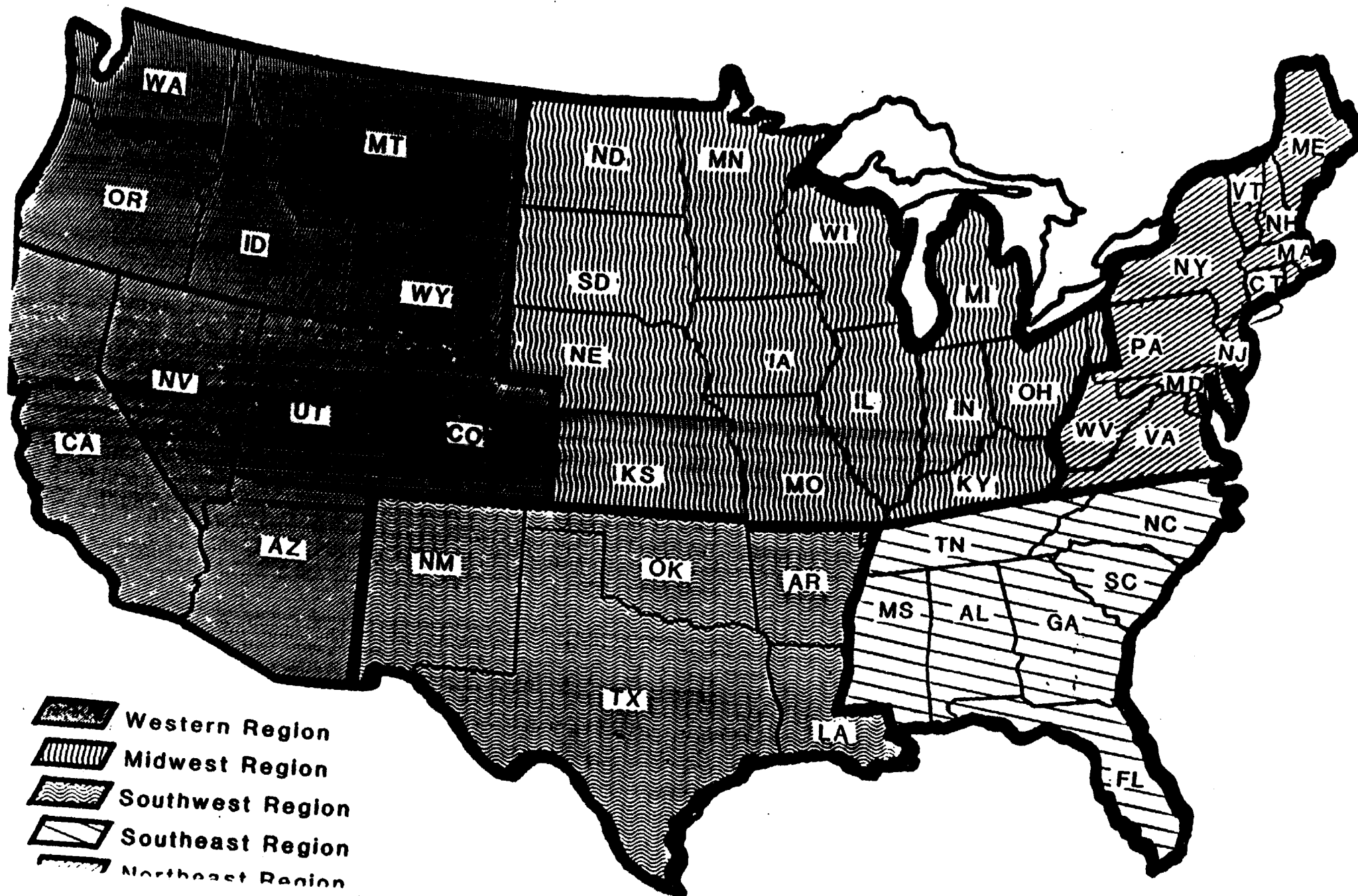
5, 50 KHz Advanced Messaging Channels

10, 25 KHz Advanced Messaging Channels

## **940-941 MHz.**

5, 100 KHz Advanced Messaging Channels

5, 100 KHz Interactive Messaging Channels



**MEMORANDUM**

TO: Carl W. Northrop  
FROM: Ash Johnston  
DATE: October 26, 1992  
RE: SUMMARY OF COMMENTS FILED IN CC DOCKET NO. 92-115  
(PART 22 REWRITE PROCEEDING)

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**I. SCOPE OF COMMENTS**

Thirty-seven parties filed Comments (see attached chart listing Commenter name, length of Comments, counsel, general scope of the filing party's Comments). The chart divides the Comments roughly into three categories: (1) comments were extensive (generally more than 25 pages) and covering numerous topics; (2) comments were of moderate length (generally between 10 and 25 pages) and covered only a few major topics; (3) comments were brief (generally less than 10 pages) and covered only one or a few topics.



## **II. THE ISSUES**

### **A. Major Issues Discussed in Bryan Cave's Comments and in Many of the Other Comments**

The attached charts indicate whether the Commenters generally supported or opposed the referenced proposals, their concerns, and their proposed alternatives. The charts cover those proposals which drew the most attention from the Commenters, as follows:

#### **Proposed Changes Which the Bryan Cave Commenters Generally Support:**

1. Elimination of notification requirements for minor changes and additional transmitters within contours of authorized stations. [pages 9-12]
2. Replacement of Carey method. [pages 13-16]
3. Elimination of traffic loading studies. [pages 17-19]
4. Automatic termination of authorizations. [pages 20-22]
5. Finder's preference. [pages 23-26]
6. Notification requirement. [pages 27-29]

#### **Proposed Changes Which the Bryan Cave Commenters Generally Oppose**

1. 1st come, 1st served application processing. [pages 30-32]
2. Conditional grants. [pages 33-35]
3. Prohibition on Multi-Frequency transmitters. [pages 36-39]
4. No reapplication for one year if authorization expires. [pages 40-42]
5. Definition of minor changes. [pages 43-47]
6. Definition of service to the public. [pages 48-51]
7. Limits on settlement payments. [pages 52-54]

<u>CATEGORY</u>	<u>COMMENTS</u>	<u>PAGES</u>	<u>COUNSEL</u>	<u>SCOPE OF COMMENTS</u>
1	BellSouth Corp./BellSouth Enterprises	81	in-house - William Barfield/David Richards	Discusses major proposals, consistency with other rulemaking proceedings, assignments and transfers, and Forms. Very similar to US West Comments.
1	Comp Comm, Inc.	40	G. Schrenk	Discusses major proposals, general application rules, paging and radiotelephone and cellular service rules and Form 401.
1	McCaw Cellular Communications, Inc.	40	in-house - Mark Hamilton/Cathleen Massey	Discusses major proposals, general application rules, operational and technical rules, and paging and radiotelephone and cellular services rules.
1	Paging Network, Inc.	46	Reed Smith Shaw & McClay - J. St. Ledger-Roty	Discusses most major proposals, general application rules, and operational and technical rules.
1	Arthur K. Peters Consulting Engrs.	31	Self	Discusses most major proposals, some general application rules, operational and technical rules.
1	Radiofone, Inc.	27	H. Mordkofsky	Discusses most major proposals, some general application rules, some operational and technical rules.

<b><u>CATEGORY</u></b>	<b><u>COMMENTER</u></b>	<b><u>PAGES</u></b>	<b><u>COUNSEL</u></b>	<b><u>SCOPE OF COMMENTS</u></b>
1	Southwestern Bell Corp.	31	in-house - James Ellis/Wm. Free	Discusses most major proposals, some general application rules, and some cellular rules.
1	Telocator	87	Wiley Rein & Fielding - M. Senkowski	Discusses major proposals, general application rules, Forms, paging and mobiletelephone rules, control channel rules, air-ground and cellular services rules.
1	U.S. West Newvector Group, Inc.	84	Wilkinson, Barker, Knauer & Quinn - Leon Knauer	Discusses major proposals, related rulemaking proceedings, assignments and transfers, general application rules, operational and technical rules, cellular rules, Forms.
2	Bell Atlantic Companies	25	Crowell & Moring - Johnn Scott	Discusses general rules, cellular rules, forms, and cross-reference table. Discussion of major proposals is minimal.
2	CTIA	9	in-house - Michael Altschul	Discusses general rules, and some cellular rules. Almost no discussion of major proposals.
2	Centel Cellular Company	8	in-house - Kevin Gallagher	Discusses related rulemaking proceedings and some general rules.

<u>CATEGORY</u>	<u>COMMENTS</u>	<u>PAGES</u>	<u>COUNSEL</u>	<u>SCOPE OF COMMENTS</u>
2	GTE Service Corp.	32	in-house - Daniel Bart	Discusses major proposals, general application rules, operational and technical rules, rural radiotelephone services rules, air-ground service rules, and cellular rules.
2	Metrocall of Delaware, Inc.	34	in-house - Harry Brock/ Christopher Kidd	Virtually identical to Telocator's comments.
2	New Par	22	Skadden Arps - Tom Casey	Discusses some major proposals, some general application and operational and technical rules, and several cellular rules.
2	Nynex Mobile Communications Co.	14	in-house - Ed Wholl/Steph en Wiznitzer	Discusses some major proposals.
2	SMR Systems, Inc.	16	Pepper & Corazzini - W. Franklin	Discusses major proposals, some general application rules, and some technical rules.
2	SNET Paging, Inc.	14	Ginsburg, Feldman & Bress - Rodney Joyce	Discusses several major proposals.

<b><u>CATEGORY</u></b>	<b><u>COMMENTER</u></b>	<b><u>PAGES</u></b>	<b><u>COUNSEL</u></b>	<b><u>SCOPE OF COMMENTS</u></b>
2	U.S. Small Business Administration	22	Barry Pineles	Focus is on small paging operators. Discusses several major proposals.
3	ALLTEL Mobile Communications, Inc.	4	in-house - Carolyn Hill	Worked with CTIA on their Comments. Briefly treats a few topics.
3	The Antenna Specialists Company	3	in-house - C. Watkins/J. Knauss	Discusses §22.507(a) only.
3	Applicants Against Lottery Abuses	16	Fisher Wayland Cooper & Leader	Discusses only limitation on settlement payments and two concerns with Form 401.
3	Richard L. Biby, Communications Engineering Services, P.C.	2	Self	Discusses only §22.371 (Disturbance of AM Broadcast station antenna patterns).
3	Claircom Communications Group	10	Akin, Gump - Tom Davidson	Primary focus is ATG Service Rules. Also discusses some general rules.
3	du Treil, Lundin & Rackley, Inc.	2	L. du Treil	Discusses only §22.371.
3	Hatfield & Dawson Consulting Engineers, Inc.	4	in-house	Discusses §22.371, §22.157 and §22.159.

<u>CATEGORY</u>	<u>COMMENTS</u>	<u>PAGES</u>	<u>COUNSEL</u>	<u>SCOPE OF COMMENTS</u>
3	International Mobile Machines Corp.	20	in-house - Jack Taylor	Focuses exclusively on BETRS.
3	Joyce & Jacobs	9	Fred Joyce	Discusses some major proposals.
3	Pacific Bell/Nevada Bell	9	in-house - William Adler/James Tuthill/Lucinda Mates	Discusses most major proposals and some general application rules.
3	PacTel Cellular	6	in-house - William Adler/M. Mowery	Discusses some general application rules, Forms, related rulemaking proceedings, some cellular rules.
3	Pac-West Telecomm, Inc./PagePrompt U.S.A.	6	Pepper & Corazzini - W. Franklin	Discusses only §22.507(a).
3	Page America Group, Inc.	9	Lathan & Watkins - James Rogers, Roy Growchowski	Discusses some major proposals, and some general application rules.
3	Petroleum Communications, Inc.	7	A. Blooston	Discusses only §22.913(b) -- suggests revising to take into account signal propagation in Gulf of Mexico.
3	RVC Services, Inc.	2	Hogan & Hartson - R. Rodin	Same as Petroleum Comms., Inc.

<b><u>CATEGORY</u></b>	<b><u>COMMENTER</u></b>	<b><u>PAGES</u></b>	<b><u>COUNSEL</u></b>	<b><u>SCOPE OF COMMENTS</u></b>
3	SkyTel Corp.	4	T. Gutierrez	Generally supports Telocator. Discusses only two major proposals.
3	United States Telephone Association	9	in-house - Martin McCue/Linda Kent	Discusses some general application rules, some operational and technical rules, Form 401.
3	Vanguard Cellular Systems, Inc.	4	in-house - Richard Rowlenson	Discusses some general rules, cellular rules.

<b>COMMENTER</b>	<b>§22.509: 1st-come, 1st-served application processing.</b>	
<b>BRYAN CAVE</b>	<b>Opposes</b>	
<b>ALLTEL</b>	<b>Opposes</b>	<b>Retain current process with preference for existing licensees in event of frequency conflicts.</b>
<b>AALA</b>		
<b>TASC</b>		
<b>BELL ATLANTIC</b>		
<b>BELLSOUTH</b>		<b>Modify to limit eligibility to existing co-channel licensees within 250 Km, and reduce cut-off period for filing MX applications to 30 days from PN.</b>
<b>BIBY</b>		
<b>CTIA</b>		
<b>CENTEL</b>		
<b>CLAIRCOM</b>		
<b>COMP COMM</b>		
<b>du TREIL</b>		
<b>GTE SERVICE CORP.</b>	<b>Supports</b>	
<b>HATFIELD &amp; DAWSON</b>		



COMMENTER	§22.509: 1st-come, 1st-served application processing.	
IMM		
JOYCE & JACOBS	Opposes	
MCCAW	Opposes	Prevents system expansion. Other proposals will speed processing. Should allow co-channel licensees 30 days from PN to file MX application.
METROCALL	Opposes	See Telocator.
NEW PAR		
NYNEX MCC	Opposes	Retain 60-day cut-off procedures.
PAC BELL		
PACTEL CELLULAR		
PAC-WEST		
PAGE AMERICA GROUP	Supports	But concerned about inability to expand system.
PAGENET	Supports	Allows preconstruction with reasonable certainty of grant and minimizes possibility of frequency being authorized to licensee seeking to delay another carrier.
PETERS CONSULTING ENGRS.	Opposes	FCC's reasoning presupposes that "strike" applications are only filed after the "impeded" application. A first-filed strike applicant can benefit (even if 22.129 is adopted) by inhibiting another carrier's system expansion. Alternative: allow 30-day window for filing of MX applications by existing co-channel licensees or applicants within certain geographic area.
PETROCOM		